

EXHIBIT D



competency, materiality, relevancy or admissibility of any data produced in response to the Requests. Any Specific Objections provided below are made in addition to these General Objections, and failure to reiterate a General Objection below does not constitute a waiver or limitation of that or any other objection.

SPECIFIC RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

With respect to the drugs on Exhibit A, the following IMS reports or data for each such drug:

- (a) National Prescription Audit (NPA, or NPA Plus)
 - Timeframe: Monthly
 - Data Elements: TRX, Extended Units TRX, NRX, Dollars
 - By Form (*e.g.*, tablets, capsules, injectable, etc.)
 - By Strength (*e.g.*, 15 mg, 30 mg, etc.)
- (b) National Sales Perspective (previously the Retail and Provider Perspective):
 - Timeframe: Monthly
 - Data elements: Units, Extended Units, Dollars
 - By NDC or its equivalent
 - By Form
 - By Strength
- (c) Method of Payment Data (from the “MSA” product and/or the NPA NRX data):
 - Any reports or data
- (d) Generic Spectra
 - Any reports or data

RESPONSE TO NO. 1:

Schering and Warrick object to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Schering and Warrick further object to the Request to the extent it seeks documents or information that are not within Schering’s or Warrick’s possession, custody, or control or are more appropriately sought from third parties to whom requests have been or may be directed. Finally, in furtherance of Schering’s and Warrick’s contractual obligations to



IMS Health Incorporated (“IMS”), Schering and Warrick object to the production of any data in response to Request No. 1, until such time as IMS consents to the production of such data or any motion for a protective order filed by IMS is denied.

By attorneys,

/s/ Eric P. Christofferson

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*Attorneys for Schering-Plough Corporation and
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Dated: August 18, 2005



CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2005, I caused a true and correct copy of the foregoing to be served on all counsel of record by electronic service pursuant to Case Management Order No. 2 entered by the Honorable Patti B. Saris in MDL 1456.

/s/ Eric P. Christofferson

Eric P. Christofferson